

Message

From: Bybee, Darcy [darcy.bybee@dnr.mo.gov]
Sent: 4/11/2017 5:05:31 PM
To: Hess, Alana [Alana.Hess@dnr.mo.gov]; Graf, Wayne [wayne.graf@dnr.mo.gov]
CC: Wilbur, Emily [emily.wilbur@dnr.mo.gov]; Basham, Aaron [aaron.basham@dnr.mo.gov]; Hale, Kendall [kendall.hale@dnr.mo.gov]; Heckenkamp, Susan [susan.heckenkamp@dnr.mo.gov]
Subject: RE: 6.261

Thanks Alana--That makes more sense to me now. Thanks for clarifying!

Thanks,
Darcy

From: Hess, Alana
Sent: Thursday, April 06, 2017 8:35 AM
To: Graf, Wayne
Cc: Bybee, Darcy; Wilbur, Emily; Basham, Aaron; Hale, Kendall; Heckenkamp, Susan
Subject: RE: 6.261

6.261 applies the limits from 6.260 to sources listed in Table II while 6.260 only applied the limits to indirect heating sources. This leads to the same problem that Ameren is having in that all sources including the engines at AECl New Madrid are required to meet a limit that originally only applied to the boilers at AECl New Madrid.

I am not asking to change the limits in Table II. I am asking to fix the language applying the limits in Table II which appears in 6.261(3)(A) by inserting "indirect heating" in front of sources similar to 6.260.

10 CSR 10-6.260:

(3) General Provisions.

(B) Restriction of Emission of Sulfur Dioxide from Indirect Heating Sources.

2. Indirect heating sources located in Missouri, other than in Franklin, Jefferson, St. Louis, St. Charles Counties, or City of St. Louis.

B. The following existing indirect heating sources listed in Table I shall limit their average sulfur emissions into the atmosphere to the allowable amount of sulfur dioxide per million Btus of actual heat input averaged on any consecutive three (3)-hour basis.

10 CSR 10-6.261:

(3) General Provisions.

(A) SO₂ Emission Limits. No later than January 1, 2017, owners or operators of sources and units listed in Table I of this rule must limit their SO₂ emissions as specified. As of the effective date of this rule, owners or operators of sources listed in Table II of this rule must limit their SO₂ emissions as specified.

Thanks,

Alana L. Hess, PE
Environmental Engineer III
Missouri Department of Natural Resources

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From: Graf, Wayne
Sent: Thursday, April 06, 2017 7:40 AM
To: Hess, Alana
Cc: Bybee, Darcy; Wilbur, Emily; Basham, Aaron
Subject: RE: 6.261

Hi Alana,

In response to your question below regarding fixing Table II., no we don't plan on "fixing Table II". Table II is correct as it stands because the statement in subparagraph (3)(B)2.B. of 6.260 stated that the *sources* listed in Table II had to meet the limit in the table. When the new sulfur rule (6.262) was developed and the 6.260 requirements had to be included in the new rule, that *source* limit was included.

It is unfortunate that both the terms "source" and "unit" were used in the 6.260 rule since it appears to have caused confusion.

Wayne

From: Wilbur, Emily
Sent: Wednesday, April 05, 2017 11:32 AM
To: Graf, Wayne; Basham, Aaron
Cc: Bybee, Darcy
Subject: FW: 6.261

Wayne/Aaron,

I received this email from Alana while I was out, and I'm just now getting a chance to forward it to you ☺ I'm pretty sure I know the answer, but I wasn't sure enough to respond. If you're ok with it, I will respond to Alana and let her know that I've forwarded her question to you. Or if you prefer, I could respond. Just let me know what you'd like in the response.

Thanks!

Emily

From: Hess, Alana
Sent: Thursday, March 30, 2017 1:25 PM
To: Wilbur, Emily
Subject: 6.261

Emily,

In 6.260 the indirect heating sources at AECl New Madrid were restricted to 10 lb SO₂/MMBtu on a three-hour average; however, in 6.261, the 10 lb SO₂/MMBtu limit was applied to the entire installation...

10 CSR 10-6.260:

(3) General Provisions.

(B) Restriction of Emission of Sulfur Dioxide from Indirect Heating Sources.

2. Indirect heating sources located in Missouri, other than in Franklin, Jefferson, St. Louis, St. Charles Counties, or City of St. Louis.

B. The following existing indirect heating sources listed in Table I shall limit their average sulfur emissions into the atmosphere to the allowable amount of sulfur dioxide per million Btus of actual heat input averaged on any consecutive three (3)-hour basis.

10 CSR 10-6.261:

(3) General Provisions.

(A) SO₂ Emission Limits. No later than January 1, 2017, owners or operators of sources and units listed in Table I of this rule must limit their SO₂ emissions as specified. As of the effective date of this rule, owners or operators of sources listed in Table II of this rule must limit their SO₂ emissions as specified.

I know you were fixing similar problems for Ameren, are you also fixing this problem for the Table II sources?

Thanks,

Alana L. Hess, PE
Environmental Engineer III
Missouri Department of Natural Resources

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